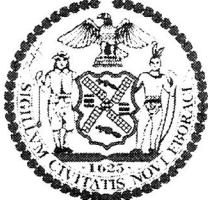


# EXHIBIT D



**Eric Gonzalez**  
District Attorney

**DISTRICT ATTORNEY**

**KINGS COUNTY**  
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March 12, 2021

**VIA REGULAR MAIL**

Mirel Fisch, Esq.  
The Law Offices of Anthony M. Grandinette  
114 Old Country Road, Suite 420  
Mineola, NY 11501

**Re: O'Hara v. City of New York, et al.  
E.D.N.Y. docket no. 17-cv-4766  
REVISED RESPONSE TO SUBPOENA**

Dear Ms. Fisch,

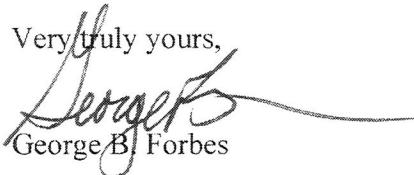
Please accept this correspondence, and attached records, as the Kings County District Attorney's revised response to your subpoena. Fifty (50) additional pages have been produced. The Bates numbers are consistent with the prior productions.

Records responsive to your request are have been produced, with the following exceptions:

**Kings County District Attorney's Office  
(E.D.N.Y., docket no. 17-cv-4766; Response to Subpoena)  
Page 2 of 2**

**REVISED PRIVILEGE LOG**

| <b>Bates No.</b>   | <b>Date</b>   | <b>Author</b>            | <b>Recipient</b>          | <b>Privileges</b>   | <b>Description</b>   |
|--------------------|---------------|--------------------------|---------------------------|---|--|
| <b>1046 – 1048</b> | Feb. 2, 2015  | James M. Bernard, Esq.   | Kenneth P. Thompson, Esq. | Attorney-Client privilege                                   | Retainer agreement that contains therein a confidential communication of legal advice.   |
| <b>1141 – 1161</b> | June 10, 2016 | Jerry H. Goldfeder, Esq. | Mark Hale, Esq.           | Attorney-Client privilege; Attorney-Work Product privilege  | Memorandum of law from attorney to client analyzing purported election law violations in People v. O'Hara, Kings Co. Ind. No. 13525/96.                                  |
| <b>1162 - 1189</b> | Unknown       | Mark Hale, Esq.          | Eric Gonzalez, Esq.       | Attorney-Work Product privilege; CPL § 160.55; CPL § 190.25 | Memo has been produced in redacted form. Final memorandum with legal analysis and recommendations from head of Conviction Review Unit to Kings County District Attorney. |

Very truly yours,  
  
George B. Forbes

GBF/